## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

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DDIANI CAMBCON and MADIA CAMBCON	AT 8:30M
BRIAN SAMPSON and MARIA SAMPSON, his wife	) WILLIAM T. WALSH, CLERK
Plaintiffs,	)   11-1701 (FSH)
-VS	) NOTICE OF REMOVAL
GLOCK Ges.m.b.H., GLOCK, INC., SAFARILAND, LLC, STREAMLIGHT CORP., ABC CORP. 1-10	) ) ) )
Defendants.	) -

Defendant, GLOCK, INC., by and through its counsel, pursuant to 28 U.S.C. §§1441(a) and 1446, hereby gives notice of the removal of this cause of action from the Superior Court of New Jersey Law Division, Morris County (Docket no. MRS-L-434-11) to the United States District Court for the District of New Jersey, and in support thereof states:

- 1. On February 10, 2011, an action was filed against the defendant, GLOCK, INC., in the Superior Court of New Jersey, Law Division, Morris County entitled *Brian Sampson and Maria Sampson v. Glock Ges.m.b.H.*, *Glock, Inc., Safariland, LLC, Streamlight Corp., and ABC Corp. 1-10.* said action being filed bearing Docket no. MRS-L-434-11.
- 2. GLOCK, INC., received the Summons and Complaint on or after March 4, 2011. A copy of the Summons and Complaint received by GLOCK, INC. is attached hereto as Exhibit "A." SAFARILAND, LLC received the Summons and Complaint on or after March 7, 2011. A copy of the Summons and Complaint received by SAFARILAND, LLC is attached hereto as Exhibit "B".
- 3. This case involves claims for product liability arising out of the alleged purchase and use of a Glock Model pistol, Safariland Model holster, and a Streamlight Model tactical light by

plaintiff. The claims are asserted against all defendants, including removing defendant GLOCK, INC.

- 4. Upon information and belief, and as set forth in the attached Complaint, plaintiff is a resident and citizen of the State of New Jersey. Specifically, plaintiff resides at 21 Snover Road, Wantage, Sussex County, New Jersey.
- 5. Defendant, GLOCK, INC. is a Georgia Corporation with its principal place of business in Smyrna, Georgia. Defendant, SAFARILAND, LLC is a limited liability company duly organized under the laws of Delaware with its principal place of business in Florida. Safariland's sole member is Armor Holdings, Inc., which is a Delaware corporation with its principal place of business in Virginia. Upon information and belief, STREAMLIGHT CORP. is a Delaware corporation with its principal place of business in Eagleville, Pennsylvania. Upon information and belief, GLOCK Ges.m.b.H. is an Austrian corporation with its principal place of business in Austria. As such, this action involves a New Jersey plaintiff, a Georgia defendant, an Austrian defendant, and two Delaware defendants, one with its principal place of business in Virginia and the other with its principal place of business in Pennsylvania, so that full diversity of parties exists.
  - 6. The Complaint alleges that plaintiff was shot in the ankle and suffered severe bodily injuries. Plaintiff also seeks the recovery of "interest and costs of suit." Thus, the matter under controversy, by virtue of plaintiff's claims for compensatory damages, exceeds the sum of \$75,000.00.
  - 7. Therefore, this action is one over which this U.S. District Court has original jurisdiction under the provisions of 28 U.S.C. §1332(a) and which is removable pursuant to the provisions of 28 U.S.C. §1441(a).

8. The removing defendant, GLOCK, INC., has contacted and received consent for this removal from co-defendant, Safariland, LLC, who <u>joins</u> in this Notice of Removal. Upon information and belief, and based upon telephone conversations with Jeff Gregory, General Counsel

for Streamlight, Corp., and counsel for Glock Ges.m.b.H., no other defendants have been served

with the plaintiffs' complaint at this time.

9. For the foregoing reasons, defendant GLOCK, INC. respectfully requests that this

action now pending against it in the Superior Court of New Jersey, Law Division, Morris County

(Docket No. MRS-L-434-11) be removed to the United States District Court for the District of New

Jersey.

Dated: White Plains, New York

March 23, 2011

Respectfully submitted,

RENZULLI LAW FIRM, LLP

James M. Brown, Esq.

81 Main Street, Suite 508

White Plains, New York 10601

Tel. No.: (914) 285-0700 Fax. No.: (914) 285-1213

Attorneys for Defendant

GLOCK, INC.

-AND-

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KANE KESSLER

MAR 2 4 2011

AT 8:30\_\_\_\_M WILLIAM T. WALSH, CLERK

Arthur Rosenberg, Esq.

1350 Avenue of the Americas New York, New York 10019

Tel. No.: (212) 519-5147 Fax. No.: (212) 245-3009

Attorneys for Defendant SAFARILAND, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NOTICE OF REMOVAL** has been served upon the below counsels of record and named parties on March 23, 2011 by United States Mail, postage paid, addressed to:

Robert D. Kobin, Esq. Nusbaum, Stein, Goldstein, Bronstein & Korn, P.A. 20 Commerce Boulevard Succasunna, NJ 07876 Attorney for plaintiff

Arthur Rosenberg, Esq. Kane Kessler 1350 Avenue of the Americas New York, NY 10019 Attorneys for Defendant SAFARILAND, LLC

Jeff Gregory, Esq. Streamlight, Corp. 30 Eagleville Road Eagleville, PA 19403

Glock Ges.m.b.H. P.O. Box 9 A2232 Deutsch Wagram Austria

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